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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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CELESTE BORYS, MARY HALL,  
SASHLEIGHA HIGHTOWER, KRISTA  
KACEY, KIRA LYNCH, and BREE  
RIGHTER,

Plaintiffs,

v.

TIMOTHY BALLARD, an individual;  
MATTHEW COOPER, an individual;  
MICHAEL PORENTA, an individual;  
OPERATION UNDERGROUND  
RAILROAD, INC., AKA OUR RESCUE,  
a Utah non-profit corporation MS  
WILLIAMS & COMPANY, LLC, a  
Wyoming Limited Liability Company and  
DOES 1 through 100,

Defendants.

**COMPLAINT FOR ANTI-  
TRAFFICKING**

Case No.: 2:24-cv-00794-RJS

Judge: Robert J. Shelby

Plaintiffs, by and through their counsel, bring this Complaint against Defendants Timothy Ballard and Operation Underground Railroad, Inc. (hereinafter "OUR"), and allege as follows:

## **I. INTRODUCTION**

Defendant Ballard and Defendant Operation Underground Railroad, organizations purportedly dedicated to fighting human trafficking, have violated Trafficking Victims Protection Reauthorization Act (TVPRA) for exploiting and trafficking women for sex and/or labor, through the deceptive tactic called the COUPLES RUSE. Rather than rescuing victims, the defendants manipulated and coerced women into sexually exploitative situations under the guise of undercover missions.

Plaintiffs hereby provide a short and plain statement of their claims showing that they are entitled to relief, as required by Federal Rule of Civil Procedure 8(a) and said notice is hereby provided below:

1. This action is brought under the Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA), 18 U.S.C. § 1595, which provides a civil remedy for victims of trafficking.
2. Plaintiffs were recruited by the Defendants to participate in "operations" under the guise of combating human trafficking, during which they were subjected to manipulation, coercion, abuse, and exploitation.
3. Defendants used deceptive practices, including but not limited to the so-called "Couples Ruse," to coerce and exploit Plaintiffs for personal and financial gain, in direct violation of federal anti-trafficking laws.

## **II. PARTIES**

4. Plaintiff Celeste Borys is a resident of Salt Lake County, State of Utah.
5. Plaintiff Mary Hall is a resident of Salt Lake County, State of Utah.
6. Plaintiff Sashleigha Hightower is a resident of Salt Lake County, State of Utah.
7. Plaintiff Krista Kacey is a resident of Utah County, State of Utah.
8. Plaintiff Kira Lynch is a resident of Utah County, State of Utah.
9. Plaintiff Bree Righter is a resident of the State of Virginia.
10. Defendant Timothy Ballard is a resident of Utah County, State of Utah and founder of Operation Underground Railroad, Inc.
11. Defendant Matthew Cooper is Ballard's right-hand-man. He is a resident of Utah County, State of Utah.
12. Defendant Michael Porenta laundered money from the MS Williams and Company, LLC so that Ballard would have cash to pay for his escorts<sup>1</sup> and pay bribes to foreign officials. He is a resident of Utah county, State of Utah.
13. Defendant Operation Underground Railroad, Inc, is a Utah non-profit corporation that claims to lead global efforts to combat human trafficking but engaged in fraudulent, exploitative, and abusive practices.
14. Defendant MS Williams & Company, LLC is a Wyoming Limited Liability Company with its sole member being Cloud Peak Law, LLC.

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<sup>1</sup> See the video for the escort in Mexico City with whom Ballard had a sexual encounter in the Ritz Carlton, using cash from the MS Williams fund.  
[https://drive.google.com/file/d/1WZRrsaXIZY3EDO5E0UN2pj8xzuwaHPAM/view?usp=drive\\_link](https://drive.google.com/file/d/1WZRrsaXIZY3EDO5E0UN2pj8xzuwaHPAM/view?usp=drive_link)

15. DOES I through 100 are potential beneficiaries under the Trafficking Victims Protection Reauthorization Act (TVPRA), Title 18, U.S. Code, Section 1595, which allows victims to bring a civil action against a "beneficiary" who profited or gained from the trafficking activities, even if they did not directly participate in the trafficking conduct. The complaint will be amended to include these entities as they become known in discovery.

### **III. JURISDICTION AND VENUE**

16. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, as the case arises under federal law, specifically the TVPRA, 18 U.S.C. § 1595.

17. Venue is proper in this Court under 28 U.S.C. § 1391 because the Defendants reside in this District and a substantial part of the events giving rise to the claims occurred within this District.

### **IV. FACTUAL ALLEGATIONS**

18. Defendant Ballard is a captivating storyteller who attracted many followers to his nonprofit organization, Operation Underground Railroad ("OUR").

19. Under the guise of philanthropic missions or "operations" aimed at rescuing women and children from human trafficking, Ballard used his position of influence and trust to exploit vulnerable individuals. Ballard specifically targeted women for sex, labor, and other services in violation of federal anti-trafficking laws.

20. Ballard used his status to recruit Plaintiffs to participate in "undercover operations" as "operatives" in order to "save women and children."

21. Ballard portrayed himself as a selfless leader who was dedicated to helping vulnerable populations.

22. However, in reality, Ballard used his influence to manipulate and coerce Plaintiffs into performing sex, labor, and services for his personal benefit and the benefit of OUR.

23. Once Ballard targeted and recruited a woman, he quickly engaged in grooming and controlling her by using a coercive tactic known as the "COUPLES RUSE."

24. The COUPLES RUSE involves a deceptive strategy in which female operatives were required to simulate intimate relationships with Ballard to purportedly fool traffickers.

### **MS WILLIAMS MONEY LAUNDERING**

25. Ballard would allegedly hire prostitutes as part of his illicit activities<sup>2</sup>, using funds that were funneled through MS Williams & Company, LLC and involving financial contributions or assistance from Defendant Porenta.

26. The use of cash from these sources allowed Ballard to obscure the transactions, making it difficult to trace payments linked to his misconduct.

27. This cash flow facilitated his exploitation of women while maintaining a façade of legitimate anti-trafficking operations under the guise of the COUPLES RUSE.

28. The 990 forms filed by OUR reveal significant payments made to MS Williams for "operations support."

29. Specifically, in the 2023 filing, MS Williams & Company, LLC is listed as having received \$1,510,262 from OUR.

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<sup>2</sup> See Audio of Ballard's attorney explaining to the Court in a sexual violence protective order hearing against Ballard, whereby he explains how Ballard would hire "high-end escorts" and then masturbate with them. [https://drive.google.com/file/d/1codq1MOr3Fcu\\_xQ5B9kt-KOEo042iDFg/view?usp=drive\\_link](https://drive.google.com/file/d/1codq1MOr3Fcu_xQ5B9kt-KOEo042iDFg/view?usp=drive_link) See also Ballard explaining that he can have sex with escorts in Latin America whenever he wants. [https://drive.google.com/file/d/1-ZkmONsiYdrcAxeMo2ZpwEYOJtzgPyY/view?usp=drive\\_link](https://drive.google.com/file/d/1-ZkmONsiYdrcAxeMo2ZpwEYOJtzgPyY/view?usp=drive_link)

30. These payments were categorized under operations-related services, but the exact nature of these services is not detailed in the 990s.

31. Under the guise of the COUPLES RUSE, this method exploited the trust and emotional needs for safety of the Plaintiffs, often leading them to believe they were entering into a mutually supportive and safe relationship, only to be manipulated into exploitative or abusive situations.

32. Ballard exploited the Plaintiffs, subjecting them to unwanted and coercive sexual advances, physical and psychological manipulation, sexual contact, and in some cases, violent sexual assault, all while promising it was "necessary to rescue children."

33. Plaintiffs have set forth in greater specificity how Ballard implemented the COUPLES RUSE and assaulted them, in Exhibits D through I, which are incorporated herewith as if fully set forth herewith.<sup>3</sup>

**A. The COUPLES RUSE<sup>4</sup>**

34. **Appearance of Legitimacy and Trust:** Due to his former work with Homeland Security, religious and political connections, and multiple media appearances, Ballard gained significant recognition as a prominent figure in the anti-trafficking movement, which made him appear as trustworthy. Ballard presented the COUPLES RUSE as a necessary tactic in undercover operations. Because of Ballard's perceived expertise and status, the COUPLES

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<sup>3</sup> [https://www.vice.com/en/article/tim-ballard-sound-of-freedom-grooming-sexual-abuse-undercover-couples-ruse-operation-underground-railroad/?utm\\_source=VICE\\_Twitter&utm\\_medium=social+](https://www.vice.com/en/article/tim-ballard-sound-of-freedom-grooming-sexual-abuse-undercover-couples-ruse-operation-underground-railroad/?utm_source=VICE_Twitter&utm_medium=social+)

For Plaintiff Righter's notice description of her experiences with the COUPLES RUSE and Tim Ballard.

<sup>4</sup> See Ballard describing the COUPLES RUSE at [https://drive.google.com/file/d/1uURxGbuaO4\\_EtnSGZP1ImYK4uAuh3fvf/view?usp=drive\\_link](https://drive.google.com/file/d/1uURxGbuaO4_EtnSGZP1ImYK4uAuh3fvf/view?usp=drive_link)

RUSE appeared to the women as a legitimate undercover tactic. Ballard would often times introduce these women to his famous friends such as United States Representative Burgess Owens, Thom Harrison, Tony Robbins and Glenn Beck, to heighten their trust that Ballard was as he claimed. He first claimed that the COUPLES RUSE would prevent the operatives from having to touch each other.

35. Then, as he gained confidence, he claimed that posing as a romantic couple, including engaging in sexual touching and sexual acts, was essential to avoid suspicion from traffickers, whom Ballard portrayed as omnipotent. However, it became clear that the COUPLES RUSE was simply a false pretense for Ballard to groom, manipulate, and sexually assault the women participating in the operations.

36. **Targeting His Victims:** Ballard seeks out women he is personally attracted to but who have no undercover training in any formal or legitimate sense and no Spanish language fluency as Ballard does, he then grooms his victim to gain her admiration and trust by positioning himself as a spiritual savior<sup>5</sup> and heroic figure in the fight against trafficking.

37. **Tailored Praise: Ballard Tells the Victim She is Perfect for Undercover Operations.** Ballard manipulates a woman into believing that she has special skills and qualities needed for undercover anti-trafficking operations, making her feel important and needed. He identifies what the woman values most or what she might be insecure about, then crafts his praise around these areas, making the praise feel deeply personal to her.

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<sup>5</sup> See Ballard and Ken Krogue explain to Celeste Borys and Ballard's daughter-in-law, Rachel Ballard, that Ballard had been prophesied to become a household name. [https://drive.google.com/file/d/19l2DAQ2T9iXi4HsXuiJ-wHp7h-QdE6lY/view?usp=drive\\_link](https://drive.google.com/file/d/19l2DAQ2T9iXi4HsXuiJ-wHp7h-QdE6lY/view?usp=drive_link)

38. **Proposing an Exotic Operation in a Foreign Country:** Ballard entices the women with promises of participating in exciting, exotic operations in foreign countries, often framed as a life-saving mission.<sup>6</sup>

39. **Explaining the COUPLES RUSE, Providing a False Sense of Security, and Soliciting Participation:** Ballard introduces the COUPLES RUSE and asks if the woman is comfortable pretending to be his romantic partner, first explaining that restrictive safe touching would be required (no touching by other traffickers), but later explaining that participating in sexual or intimate physical contact with him could be necessary, though his psychic Janet Russon is telling him he is a prophet and does not have to obey the rules.<sup>7</sup> He represents to her that he will keep her safe and protect her throughout the process, portraying himself as a comforting and nurturing figure. He also wants to practice with the woman well before the OP, going to the woman's home, hotel room or office and trying to take the woman to a strip club or massage parlor together, to make sure they have chemistry.

40. **Secrecy, Isolation, and Control Through Non-Disclosure Agreements:** Once trust is established, Ballard has Matthew Cooper or another associate facilitate the signing of NDAs, framing the agreement as a professional requirement, while emphasizing that the woman will be paid for her involvement. This leads the woman to believe that everything related to operations is confidential, which leaves her isolated from her support systems such as friends, family, or co-workers, making her increasingly reliant on Ballard and Cooper. Ballard uses

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<sup>6</sup> [https://drive.google.com/file/d/1bGgBanewmsiems1xNg36-65qDgtKvUg9/view?usp=drive\\_link](https://drive.google.com/file/d/1bGgBanewmsiems1xNg36-65qDgtKvUg9/view?usp=drive_link)

<sup>7</sup> [https://drive.google.com/file/d/1TM7UeSx84cdHQZENIFoJGDL6DFNFxqGN/view?usp=drive\\_link](https://drive.google.com/file/d/1TM7UeSx84cdHQZENIFoJGDL6DFNFxqGN/view?usp=drive_link)



emotional, psychological, physical, and spiritual tactics to exert control over the woman's behavior.

41. **Manipulation of Emotions:** Ballard texts the woman, playing on the woman's emotional vulnerabilities and cultivating a personal relationship by convincing her that developing physical and spiritual intimacy is essential for their performance in operations.<sup>8</sup> Over time, he uses this emotional connection to groom her and make her more dependent on him.<sup>9</sup>

42. **Normalization of Boundary-Crossing Behaviors:** Ballard shares personal, intimate grievances, claiming his wife Katherine does not meet his sexual needs, specifically referring to her refusal to get a Brazilian wax or to engage in sexual activities outside of her religious commitments. Ballard normalizes these inappropriate sexual conversations, framing them as part of fully connecting as a COUPLES RUSE partner.<sup>10</sup>

43. **Leveraging Jealousy or Competition and Confusion over the COUPLES RUSE Rules:** Ballard introduces elements of jealousy or competition into the dynamic, making the woman feel like she is having to prove herself by claiming that other women have failed the mission by falling in love with him. He speaks horribly of other members on the team, such as

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<sup>8</sup> See Text Messages between Ballard and Ms. Lynch.

[https://drive.google.com/file/d/1VsHnX2adRWo3z1Y0fSXCQrveJpiHq1sH/view?usp=drive\\_link](https://drive.google.com/file/d/1VsHnX2adRWo3z1Y0fSXCQrveJpiHq1sH/view?usp=drive_link)

<sup>9</sup> See Text Messages between Ballard and JJ, attached hereto as Exhibit B.

<sup>10</sup> See Audio of Ballard explaining to Celeste Borys how he wants his wife to take off her LDS garments [https://drive.google.com/file/d/1mpX7hz84oyFchqZj7R6xYMiTejcEnxj4/view?usp=drive\\_link](https://drive.google.com/file/d/1mpX7hz84oyFchqZj7R6xYMiTejcEnxj4/view?usp=drive_link) when they have sexual relations. Likewise, Ballard came to Ms. Borys and explained that they needed "to sit down and talk about how to balance ops/HP relationship vs. CEO/EA relationship. We need to be very careful! We need to compartmentalize. So much hangs in the balance! At least I knew this – I have an almost impossible – to- understand faith and trust in you that usually takes almost a lifetime for me to get with someone." See Text Messages, attached hereto as Exhibit C.

Matt Cooper, Michael Porenta, Matt Osborn and others, as well as other female operators, so that the women would feel competitive and afraid that he would deem them a traitor or get sued by Ballard if they do not perform adequately. He emphasizes that there are rules that must be followed<sup>11</sup>, but then asks, "How far are you willing to go to save a child?" This leads to the woman being confused when he begins to manipulate emotions and push boundaries farther.

44. **Practicing Physical Chemistry:** Once the woman has been groomed into a position of trust or emotional dependence, Ballard escalates attempts to sexually manipulate the woman into coercive sexual situations, such as "practicing" physical intimacy, claiming it is essential to maintain the illusion of being a couple during operations. The woman often feels pressured to comply because it's Tim Ballard, the anti-trafficking expert.

45. **Creating Mutual Blackmail:** Ballard tells the woman that they both have compromising information on each other, ensuring they won't reveal his sexual misconduct by framing their relationship as one of mutual trust and secrecy.

46. **Sharing Legal Communications to Enhance His Alpha Male Image:** Ballard would often share confidential legal communications to impress the women and reinforce his image as a powerful and influential figure.<sup>12</sup>

47. **Isolating the Woman from Other OUR Team Members:** Ballard would intentionally isolate the women from other members of the team, making it easier to manipulate and exploit them sexually.

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<sup>11</sup> See Ballard explain how the COUPLES RUSE has rules

[https://drive.google.com/file/d/1WQOsm--801kOiqQ29iP6N7YrirRiskRy/view?usp=drive\\_link](https://drive.google.com/file/d/1WQOsm--801kOiqQ29iP6N7YrirRiskRy/view?usp=drive_link)

<sup>12</sup> See Text Message between Ballard and Ms. Kacey, whereby he is bragging about bashing General Counsel for OUR for having the audacity to call out Ballard for entrapment techniques, attached hereto as Exhibit A.

48. **Sexual Assaults with Matthew Cooper as a Witness:** In many cases, Ballard would sexually assault the women in private settings where Matthew Cooper would be present or nearby, ready to provide false testimony if necessary.

49. **Ghosting and Gaslighting the Women After Resistance:** If a woman resisted his advances or became suspicious, Ballard would claim he could no longer participate in operations due to his fame. He would then "ghost" the woman and shift responsibility for future operations to other members of the team, making it appear as though the sexual assault was part of the program. He would claim, such as with Plaintiff Hightower and others, to be a traitor when they exposed his criminal fraud.

**B. OUR'S KNOWLEDGE AND BENEFIT**

50. Defendant OUR, despite awareness and knowledge of Ballard's labor and sex trafficking, facilitated and covered up these actions, failing to protect Plaintiffs. OUR actively participated in the solicitation, recruitment, and exploitation of Plaintiffs and profited by these illegal activities.

51. In fact, OUR upper management facilitated Ballard's abuse of these women by given OUR employees time off by cooking the books so that non-COUPLES RUSE employees would not know what the COUPLES RUSE partner was doing.<sup>13</sup>

52. The actions of Defendants were designed to exploit the Plaintiffs for Ballard's sexual gratification, by having Plaintiffs perform sex, labor, and services under the guise of noble humanitarian missions, which is prohibited under the TVPRA.

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<sup>13</sup> See Voicemail of Brad Damon, explaining to Ms. Borys how to manipulate her work records so that no one would know she was with Ballard and she would not have to take time off. [https://drive.google.com/file/d/1B3lbOaBm843n0ygvJJeJtH3HxrEzyMSH/view?usp=drive\\_link](https://drive.google.com/file/d/1B3lbOaBm843n0ygvJJeJtH3HxrEzyMSH/view?usp=drive_link)

53. Ballard and OUR have used many of the Plaintiff's communications against them, despite the communications being made at the behest of Ballard and/or OUR when the Plaintiffs still believed the COUPLES RUSE was legitimate.

54. For example, Ballard has sued the Plaintiffs for defamation.

55. OUR has sued Plaintiff Celeste Borys for defamation and violating the NDAs.

56. However, Ballard recently revealed while in an impaired state on a podcast that his wife Katherine Ballard instructed to be immediately taken down, that the COUPLES RUSE was developed by him through prayer and study.<sup>14</sup>

57. OUR has acknowledged that the COUPLES RUSE was a "past sin" of OUR.<sup>15</sup>

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<sup>14</sup> See Video of an apparently impaired Ballard explaining how he invented the COUPLES RUSE and that it is weird

[https://drive.google.com/file/d/1c6XBV3JJpRM8v1czqGxMpBaWOQ\\_nFpK/view?usp=drive\\_link](https://drive.google.com/file/d/1c6XBV3JJpRM8v1czqGxMpBaWOQ_nFpK/view?usp=drive_link)

Ballard's wife Katherine Ballard had the podcast immediately taken down because of the things Ballard said on the podcast. [https://drive.google.com/file/d/1h3KU-f8OUC5q3\\_raPQu-E5sqJuzz3PaO/view?usp=drive\\_link](https://drive.google.com/file/d/1h3KU-f8OUC5q3_raPQu-E5sqJuzz3PaO/view?usp=drive_link)

<sup>15</sup> See Video of Ballard's replacement at OUR, Tammy Lee, declaring that the COUPLES RUSE was a past sin of OUR.

[https://drive.google.com/file/d/1z9WbHwcXeqOcGcy9Ltivs3nHuRorjtFw/view?usp=drive\\_link](https://drive.google.com/file/d/1z9WbHwcXeqOcGcy9Ltivs3nHuRorjtFw/view?usp=drive_link)

**CAUSE OF ACTION**

**VIOLATIONS OF THE TRAFFICKING VICTIMS PROTECTION  
REAUTHORIZATION ACT OF 2003 (TVPRA) FOR SEXUAL AND LABOR  
TRAFFICKING  
(18 U.S.C. § 1595)**

**“THE ANTI-TRAFFICKERS ARE THE TRAFFICKERS”**

58. Plaintiffs re-allege and incorporate by reference all preceding paragraphs as if fully set forth herein.

59. Defendants knowingly recruited, transported, harbored, and engaged Plaintiffs for labor and services through means of fraud, coercion, and deception, in violation of 18 U.S.C. §§ 1589 and 1590, or are beneficiaries of such.

60. Plaintiffs were coerced into participating in operations that subjected them to sexual exploitation and forced labor under false pretenses.

61. Defendants' conduct caused Plaintiffs severe emotional and physical harm.

62. As a result of Defendants' violations of the TVPRA, Plaintiffs are entitled to compensatory and punitive damages as well as attorneys' fees and costs.

**VII. PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendants and award Plaintiffs the following relief:

1. Compensatory damages for physical, emotional, and psychological injuries sustained by Plaintiffs;
2. Punitive damages to punish and deter future unlawful conduct;

3. Reasonable attorneys' fees and costs as provided by law;
4. Any such further relief as this Court deems just and proper;
5. Any other relief the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs demand a trial by jury on all issues so triable.

DATED this 22<sup>nd</sup> day of October, 2024.

**ALL UTAH LAW PLLC**

/s/ Suzette Rasmussen  
Suzette Rasmussen

**MORTENSEN MILNE**

/s/ Alan W. Mortensen  
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